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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19 -30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**DECLARATION OF RICHARD W. SLACK
IN SUPPORT OF DEBTORS' OBJECTION
TO MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
FOR ENTRY OF A PROTECTIVE ORDER**

Date: June 26, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: June 19, 2019
4:00 p.m. (Pacific Time)

1 I, Richard Slack, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am a partner with Weil, Gotshal & Manges LLP, counsel to Pacific Gas and Electric
5 Company (the “**Utility**”) and its parent, PG&E Corporation, both Debtors and Debtors in Possession in
6 the above-captioned chapter 11 reorganization cases. I submit this declaration in support of the
7 Debtors’ *Objection to Motion of the Official Committee of Tort Claimants for Entry of a Protective*
8 *Order* (the “**Objection**”) for entry of the amended proposed protective order annexed to the Objection
9 as **Exhibit A** (the “**Amended Protective Order**”). The matters stated herein are based upon my
10 personal knowledge (including from a review of our firm’s relevant books and records and certain
11 publicly filed documents in these Cases), and if called as a witness I can and would testify to them on
12 that basis.

13 2. In addition to the protective orders attached to the *Declaration of Richard W. Slack in*
14 *Support of Motion for Entry of Protective Order Pursuant to Fed. R. Bankr. P. 7026 and 9014(c) and*
15 *11 U.S.C. § 105(a) Governing Discovery Materials and Other Information*, dated June 7, 2019 [Docket
16 No. 2460], attached as **Exhibits A** through **D** are additional protective orders that require the party
17 challenging a confidentiality designation to prosecute its own challenge, rather than burdening the
18 designating party with filing a motion regarding such a challenge:

- 19 • Attached as **Exhibit A** is a true and correct copy of Protective Order Regarding the
20 Disclosure and Use of Discovery Materials; *Sciacca v. Apple*, Case No. 5:18-cv-3312-
21 LHK (Oct. 25, 2018), ECF No. 48.
- 22 • Attached as **Exhibit B** is a true and correct copy of the United States District Court for
23 the Southern District of California’s Model Protective Order, available at
24 https://www.casd.uscourts.gov/_assets/pdf/forms/Model%20Protective%20Order.pdf.
- 25 • Attached as **Exhibit C** is a true and correct copy of the Stipulation and Model
26 Protective Order of United States Magistrate Judge Ona T. Wan of the United States
27 District Court for the Southern District of New York, available at
28 http://www.nysd.uscourts.gov/cases/show.php?db=judge_info&id=1512.

- Attached as **Exhibit D** is a true and correct copy of Stipulation and Order Regarding Confidential Information, Appendix A to the Individual Practice Rules of United States Magistrate Judge Anne Y. Shields of the United States District Court for the Eastern District of New York, available at <https://img.nyed.uscourts.gov/rules/AYS-MLR.pdf>.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration is executed on June 19, 2019.

/s/ Richard W. Slack
Richard W. Slack